United States Bankruptcy Court Southern District of Texas

ENTERED

May 20, 2025 Nathan Ochsner, Clerk

IN THE UNITED STATED BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§	
	§	CASE NO: 25-90012
PLATINUM HEIGHTS, LP,	§	
	§	
Debtor.	§	
	§	
	8	CHAPTER 11

STIPULATION AND AGREED ORDER REGARDING MEDIATION AMONG THE DEBTOR, MIRZA BAIG, AND CLS HEIGHTS, LLC

Debtor Platinum Heights, LP (the "<u>Debtor</u>"), its principal Mirza Baig ("<u>Baig</u>"), and interested party CLS Heights, LLC ("<u>CLS</u>", and, collectively with the Debtor and Baig, the "<u>Parties</u>" or each a "<u>Party</u>"), hereby enter into this Stipulation and Agreed Order (the "<u>Order</u>") as follows:

- 1. The Parties agree to participate in a mediation to resolve the disputes among them, which include but are not limited to the prepetition litigation filed by CLS (the "Mediation"). As such, the Parties hereby request entry of this Order directing the parties to attend the Mediation pursuant to Section S of the Procedures for Complex Cases in the Southern District of Texas (the "Complex Case Procedures"). Judge Marvin Isgur is appointed mediator. At all times, he will be acting in the capacity of a United States Bankruptcy Judge, with all privileges and immunities attaching to his role as mediator.
- 2. The Parties shall attend the Mediation around May 30, 2025, subject to availability of the Parties and the mediator. The Court will assist the Parties in coordinating with other judges in this District to determine their availability to serve as the mediator under this Order.
- 3. The scope of the Mediation shall include the claims and causes of action presented in the prepetition litigation between the Parties and any additional issues presented by the

¹ The last four numbers of the Debtor's federal taxpayer identification number are 4367. The location of the Debtor's service address is: 1917 Ashland Street, Houston, TX 70088.

commencement of this chapter 11 case. The mediator is authorized to mediate any disputes between the Parties.

- 4. The Parties and their respective counsel shall participate in the Mediation in good faith.
- 5. The results of the mediation are non-binding upon any of the Parties, except solely to the extent that a Party agrees in writing to be bound by a settlement reached at the mediation.
- 6. The Debtor is authorized to take all action necessary to effectuate the relief granted in this Order.
- 7. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

 SIGNED 05/20/2025

Alfredo R Pérez

United States Bankruptcy Judge

STIPULATED AND AGREED TO BY:

REED SMITH LLP

By: /s/ Omar J. Alaniz

Omar J. Alaniz (SBN 24040402) 2850 N. Harwood St., Ste. 1500

Dallas, TX 75201

Telephone: (469) 680-4200 Facsimile: (469) 680-4299 Email: oalaniz@reedsmith.com

Counsel for Platinum Heights LP

GRAY REED

By: /s/ Aaron M. Kaufman

Aaron M. Kaufman (SBN 24060067) 1300 Post Oak Blvd., Ste 2000

Houston, TX 77056

Telephone: (713) 986-7000 Email: akaufman@grayreed.com

sfunk@grayreed.com

Counsel for CLS Heights, LLC